

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	
Edward P. Mansur,	)	Bankruptcy No. 19-20017 GLT
	)	Chapter 13
Debtor	)	Related to Document No. 84
	)	
Ronda J. Winnecour, Chapter 13 Trustee,	)	
	)	
Movant	)	
	)	
vs.	)	
	)	
Edward P. Mansur,	)	
	)	
Respondent	)	

**RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

AND NOW, comes the Debtor, Edward P. Mansur ("Debtor"), by and through attorney, Christopher M. Frye and Steidl and Steinberg, P.C., and respectfully responds to the Movant's motion as follows as follows:

1. Admitted.
2. Admitted.
3. Denied. The Debtor remitted a payment in the amount of \$10,232.00 which was received by the Trustee on January 24, 2024. This payment meets the plan base of \$304,548.00.
4. Admitted by way of further answer. The Debtor will continue to make payment to the Trustee and needs some additional time to pay the remaining balance to complete the Plan.
5. Denied. The Debtor has met the plan base of \$304,548.00 with his most recent payment.
6. Admitted.
7. Denied. The Debtor has met the plan base of \$304,548.00 with his most recent payment.

WHEREFORE, the Debtor, Edward P. Mansur, respectfully request this Honorable Court to deny the Movant's motion.

Respectfully submitted,

January 29, 2024  
DATE

/s/ Christopher M. Frye  
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